

1 DAVID L. ANDERSON (CABN 149604)  
2 United States Attorney  
3 SARA WINSLOW (DCBN 457643)  
Chief, Civil Division  
3 PAMELA T. JOHANN (CABN 145558)  
Assistant United States Attorney

4 450 Golden Gate Avenue, Box 36045  
5 San Francisco, California 94102  
6 Telephone: (415) 436-7025  
Facsimile: (415) 436-7234  
7 pamela.Johann@usdoj.gov

7 Attorneys for Defendant UNITED STATES  
8 DEPARTMENT OF LABOR

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10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 SAN FRANCISCO DIVISION

13  
14 THE CENTER FOR INVESTIGATIVE ) Case No. 19-cv-05603-SK  
15 REPORTING and WILL EVANS, )  
16 Plaintiffs, ) **STIPULATED PROPOSED BRIEFING**  
17 v. ) **SCHEDULE; ORDER AS MODIFIED**  
18 UNITED STATES DEPARTMENT OF )  
19 LABOR, )  
Defendant. )  
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21 Pursuant to this Court's Order dated December 3, 2019, Dkt. No. 16, Plaintiffs The Center For  
22 Investigative Reporting and Will Evans (collectively referred to as "CIR") and Defendant United States  
23 Department of Labor ("DOL") respectfully submit this Stipulated Proposed Briefing Schedule.

24 Following a meet and confer process, the following issue remains in dispute: whether Defendant  
25 has appropriately asserted legal exemptions with respect to certain documents that were withheld from  
26 production in whole or in part. The parties believe that this issue is suitable for submission to the Court  
27 through cross-motions for summary judgment motion. The parties stipulate to and jointly propose the  
28 following schedule:

1. Last day for Defendant to file Motion for Summary Judgment: February 4, 2020, not to  
2 exceed 25 pages of text.
3. Last day for Plaintiffs to file Opposition and Cross Motion for Summary Judgment:  
4 March 3, 2020, not to exceed 25 pages of text.
5. Last Day for Defendant to file Reply and Cross-Opposition: March 17, 2020, not to  
6 exceed 20 pages of text.
7. Last Day for Plaintiff to file Cross-Reply (if necessary): March 31, 2020, not to exceed  
8 20 pages of text.
9. Hearing: April 20, 2020 at 1:30 p.m.

10  
11 DATED: December 11, 2019

Respectfully submitted,

12 DAVID L. ANDERSON  
13 United States Attorney

14 /s/ Pamela T. Johann  
15 PAMELA T. JOHANN  
16 Assistant United States Attorney

17 Attorneys for Defendant

18 DATED: December 11, 2019

19 THE CENTER FOR INVESTIGATIVE  
20 REPORTING

21 /s/ D. Victoria Baranetsky  
22 D. VICTORIA BARANETSKY

23 Attorneys for Plaintiffs

24 ATTESTATION

25 I, Pamela T. Johann, hereby attest that I have obtained the concurrence in the filing of this  
26 document from D. Victoria Baranetsky.

27 /s/ Pamela T. Johann  
28 PAMELA T. JOHANN

## ORDER

Pursuant to the parties' stipulation, the Court adopts the requested briefing schedule. The hearing will be held on April 27, 2020.

## IT IS SO ORDERED.

Dated: December 11, 2019

Ashley Kini

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HON. SALLIE KIM  
United States Magistrate Judge